

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

AMERICAN SPIRIT AND CHEER
ESSENTIALS, INC., ROCKSTAR
CHAMPIONSHIPS, LLC, JEFF & CRAIG
CHEER, LLC, d/b/a JEFF AND CRAIG
CAMPS, and ASHLEY HAYGOOD,
Individually and on Behalf of all Others
Similarly Situated,

Plaintiffs,

v.

VARSITY BRANDS, LLC, BSN SPORTS,
LLC, VARSITY SPIRIT, LLC, STANBURY,
LLC, HERFF JONES, LLC, BAIN CAPITAL,
LP, CHARLESBANK CAPITAL
PARTNERS, LLC, VARSITY BRANDS
HOLDING CO., INC., VARSITY SPIRIT
FASHION & SUPPLIES, LLC, U.S. ALL
STAR FEDERATION, INC., USA
FEDERATION FOR SPORT CHEERING,
d/b/a USA CHEER, VARSITY INTROPIA
TOURS, LLC and JEFF WEBB,

Defendants.

CIVIL ACTION

FILE NUMBER:

2:20-cv-02782-SHL-atc

CERTIFICATE OF CONSULTATION

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Pursuant to LR 7.2(a)(1)(b), Plaintiffs certify that, though all Plaintiffs are in agreement with the action requested by the motion, after consultation the Defendants are unable to reach an accord as to all issues.

The names of participating counsel include: Robert A. Falanga (Law Offices of Falanga & Chalker), Brendan P. Gaffney (Locke Lord LLP), Steven J. Kaiser (Cleary Gottlieb Steen & Hamilton LLP), and Nicole Berkowitz (Baker, Donelson, Bearman, Caldwell & Berkowitz P.C.).

The dates of the consultation were: October 31, 2020 – November 3, 2020.

The manner of the consultation was: electronic mail.

This 3rd day of November, 2020.

Respectfully submitted,

s/ Robert A Falanga

Robert A. Falanga, Esq.

Attorney Bar No. 254400

Attorney for Plaintiffs and their Putative
Classes

Motion for admission

pro hac vice forthcoming

s/ Kobelah Svensen Bennah

Kobelah Svensen Bennah

Attorney Bar No. 378113

Attorney for Plaintiffs and their Putative
Classes

LAW OFFICES

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